

## EXHIBIT 218

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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6           \*\*\*\*\*

7   IN RE:

8   NATIONAL PRESCRIPTION OPIATE       MDL NO. 2804  
LITIGATION

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          This document relates to:           Case No. 17-MD-2804

10

          All cases                           Hon. Dan A. Polster

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13                   HIGHLY CONFIDENTIAL - SUBJECT TO  
14                   FURTHER CONFIDENTIALITY REVIEW

15                   VIDEOTAPED DEPOSITION OF:

16                   STEVE REARDON

17                   ALOFT BOSTON SEAPORT

18                   401-403 D Street

19                   Boston, Massachusetts

20                   November 30, 2018       9:03 a.m.

21

22                   Darlene M. Coppola

23                   Registered Merit Reporter

24                   Certified Realtime Reporter

1           A.    I don't recall seeing it.

2           BY MR. PAPANTONIO:

3           Q.    Did your company sell each one of these  
4           things, oxycodone, alprazolam, benzodiazepine?  
5           Did you all sell that?

6                       MR. PYSER:   Object to form.

7           A.    Yes.

8           BY MR. PAPANTONIO:

9           Q.    According to the medical examiner's  
10           office, they have seen a 127 percent increase in  
11           the number of deaths associated with  
12           benzodiazepines in the State of Florida between  
13           2005 and 2010.

14                    You were there in 2005 as -- in charge of  
15           quality regulation, right?

16           A.    Yes.

17           Q.    You were there in 2006 in that position,  
18           correct?

19           A.    Correct.

20           Q.    You were there in 2007 in that position,  
21           correct?

22           A.    Part of the year.

23           Q.    And then it goes on to say -- as a matter  
24           of fact, you were a leader in those positions,

1 weren't you, sir?

2 I mean, part of your job was to be a  
3 leader in those positions, correct?

4 A. Correct.

5 Q. It says "Approximately February 2009  
6 through 2010, monthly oxy -- oxycodone sales to  
7 Florida practitioners steadily increased and well  
8 surpassed monthly oxycodone sales in the remaining  
9 states."

10 Now, did you know that Florida actually  
11 had the highest sales in the country during that  
12 period of time?

13 MR. PYSER: Object to form.

14 A. I was not aware.

15 BY MR. PAPANTONIO:

16 Q. But you were there in 2005, what was  
17 your -- daily, in 2005, you would review orders  
18 that would come in from the company, correct?

19 MR. PYSER: Object to form.

20 A. Not personally.

21 BY MR. PAPANTONIO:

22 Q. Not personally, but you had a department  
23 that did that. There was three of you all?

24 A. Correct.

1 organization not sure what their role is or should  
2 be."

3 Did you write that?

4 A. No.

5 Q. And then the last one, "Would like to see  
6 stronger regulatory, i.e., FDA affairs could be a  
7 strategic advantage," right?

8 Do you see that?

9 A. Yes.

10 Q. Now, you agree, sir, that the idea of  
11 following regulatory standards was undersourced.  
12 You agree with that?

13 MR. PYSER: Object to form.

14 BY MR. PAPANTONIO:

15 Q. It was undersourced. You see the next  
16 one. It says "People undersourced today"?

17 A. Again, this piece of it speaks to the  
18 manufacturing side of the business.

19 Q. Yeah, which is a Cardinal business. I  
20 want to be sure. It's a Cardinal business,  
21 correct?

22 A. Correct.

23 Q. All right. "People have -- people we have  
24 are good, don't have enough bench strength."

1       you shredded?

2                               MR. PYSER: Object to form.

3       Argumentative.

4       A.    No, I wouldn't -- no.

5       BY MR. FULLER:

6       Q.    You wouldn't have shredded that one?

7       A.    No.

8       Q.    Just other documents?

9                               MR. PYSER: Object to form.

10       BY MR. FULLER:

11       Q.    Right?

12                               MR. PYSER: Object to form.

13       A.    Other documents that required shredding.

14                               MR. FULLER: Sure. So these

15       ingredient limit reports -- let me see 3756.

16       That's a big one.

17                               This is going to be Plaintiffs' Exhibit

18       31.

19

20                               (Exhibit No. 31 marked for

21       identification.)

22

23       BY MR. FULLER:

24       Q.    Have you seen this type of document

1 before? It appears to be an ingredient limit  
2 report, correct?

3 A. Not in this format, but yes.

4 Q. It is an ingredient limit report?

5 A. Yes.

6 Q. And this is something Cardinal kept in the  
7 normal course of business; is that right?

8 A. Yes.

9 Q. And I'll represent to you that Cardinal's  
10 produced this to the plaintiffs in this case,  
11 amongst other ingredient limit reports, some of  
12 them going back to 2005. We should have, at least  
13 according to your testimony, ingredient limit  
14 reports going back prior to that; is that right?

15 MR. PYSER: Object to form. You can  
16 testify about what you should have.

17 A. It was implemented '94, '95.

18 BY MR. FULLER:

19 Q. So you believe ingredient limit reports  
20 started being created by Cardinal in 1994 or '95.  
21 Correct?

22 A. Correct.

23 Q. And it's your understanding that these  
24 documents were provided to the DEA; isn't that

1 true?

2 A. Correct, on a monthly basis.

3 Q. And it's also your testimony that this  
4 document, this 535-page document, if I can get my  
5 copy.

6

7 (Brief pause in proceedings.)

8

9 MR. FULLER: You stay right there.

10 MR. PYSER: Move to strike.

11

12 (Brief pause in proceedings.)

13

14 BY MR. FULLER:

15 Q. These, again, were kept in the normal  
16 course of business at Cardinal and provided to the  
17 DEA; is that correct?

18 A. Correct.

19 Q. And this is 535 pages of suspicious  
20 orders; isn't that true?

21 A. I haven't counted the pages, but...

22 Q. If you go to the last page, I think it  
23 will tell you what it was.

24 MR. PYSER: I'm going to object to



1 the claims and the length of this. The way it's  
2 presented has added significantly to the page  
3 number.

4 MR. FULLER: This is the way it was  
5 produced.

6 A. Not the format that it typically comes  
7 in.

8 BY MR. FULLER:

9 Q. Fair enough. You may see it in a  
10 different format?

11 A. Yes.

12 Q. But this document is inclusive of, at  
13 least out of the Wheeling distribution center,  
14 right you see that at the top?

15 A. Yes.

16 Q. Out of the Wheeling distribution center  
17 for July of 2007, if this report was run  
18 accurately and produced to us in the format that  
19 Cardinal kept it in, this would be how many ever  
20 pages are here, I'm saying there's 535, whatever  
21 the page count is, this is all suspicious orders,  
22 right?

23 A. Based on the criteria that the DEA agreed  
24 to.

1 Q. Based on whatever. These are all  
2 suspicious orders under your CFR reporting  
3 requirement, correct?

4 A. Correct.

5 Q. And Cardinal shipped all these orders out  
6 into our communities across the country, didn't  
7 they?

8 MR. PYSER: Object to form.

9 A. It may have been some that were caught at  
10 the distribution center and investigated.

11 BY MR. FULLER:

12 Q. Well, this report isn't generated until  
13 the end of the month, right?

14 A. But it's a two-step process.

15 Q. I understand, but just listen to my  
16 question.

17 This report isn't generated until the end  
18 of month, correct?

19 A. Correct.

20 Q. And any shipments that have gone, have  
21 long gone out because it's usually 24-hour  
22 turnaround, correct?

23 A. Correct.

24 Q. So if you look, there's, actually, I